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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

TRI-VALLEY CARES,	)	No. C 08-5408 SC
	)	
Plaintiff,	)	
	)	<b>STIPULATION TO BRIEFING; and</b>
v.	)	<b>[Proposed] ORDER</b>
	)	
UNITED STATES DEPARTMENT OF	)	
ENERGY and NATIONAL NUCLEAR	)	
SECURITY ADMINISTRATION,	)	Date: July 23, 2010
	)	Time: 10:00 a.m.
Defendants.	)	
	)	

Plaintiff, Tri-Valley Cares, and defendants, the United States Department of Energy (“DOE”),  
and the National Nuclear Security Administration (“NNSA”), by and through their counsel of  
record, hereby stipulate, subject to the approval of the Court, to the following briefing schedule in  
this Freedom of Information Act (FOIA) case:

1. On March 17, 2010, the Court vacated the case management conference scheduled for  
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March 19, 2010.

2. The parties believe this case can be resolved through cross-motions for summary judgment, in which plaintiff would file its motion first given plaintiff's intent to challenge as of yet unidentified agency redactions and its pattern and practice claim.

3. Accordingly, the parties respectfully ask this Court to set the briefing schedule on the parties' cross-motions for summary judgment as follows:

Plaintiff's Motion for Summary Judgment:	April 16, 2010.
Defendants' Cross-Motion and Opposition:	May 17, 2010
Plaintiff's Cross-Opposition and Reply:	June 16, 2010
Defendants' Reply:	July 1, 2010
Hearing:	<b>July 23, 2010 at 10:00 a.m.</b>

Dated: March 18, 2010

Respectfully submitted,

JOSEPH P. RUSSONIELLO  
United States Attorney

\_\_\_\_\_  
/s/  
ILA C. DEISS  
Assistant United States Attorney  
Attorney for Defendants

ISAAC CAMPBELL  
Trial Attorney  
United States Department of Justice

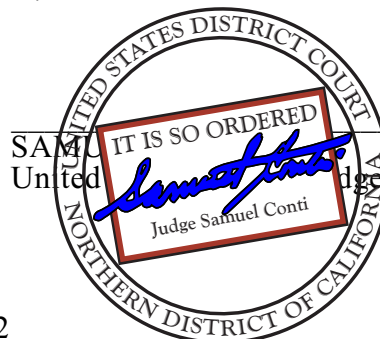
Dated: March 18, 2010

\_\_\_\_\_  
/s/  
SCOTT J. YUNDT  
Attorney for Plaintiff

**ORDER**

Pursuant to the stipulation, IT IS SO ORDERED.

Date: 3/18/10



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